

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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) **Civil Action No. 03. MDL 1570 (GBD)**  
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**DEFENDANT INTERNATIONAL ISLAMIC RELIEF ORGANIZATION SAUDI  
ARABIA'S 26(a)(1) INITIAL DISCLOSURES**

Defendant International Islamic Relief Organization (Saudi Arabia) ("IIROSA"), by and through its undersigned counsel, makes the following initial disclosures pursuant to Federal Rules of Civil Procedure 26(a)(1). These initial disclosures are based on information reasonably available to IIROSA as of the date hereof. The disclosures herein are provided without prejudice to the rights of IIROSA to identify additional witnesses or evidence. Further, IIROSA reserves the right to supplement these initial disclosures.

**I. Individuals With Relevant Discoverable Information**

The following individuals are likely to have discoverable information of IIROSA's regulation of orphans' stipends that may be used to support its defenses. IIROSA does not consent to or authorize any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by IIROSA and does not consent to or authorize any other communication prohibited by any applicable rule of professional conduct.

- 1. Dr. Adnan Basha**  
Address: Jeddah, Saudi Arabia  
Contact: Mr. Basha can be reached through counsel  
Subject: IIROSA's mission policies on grants and disaster relief
- 2. Ahmed Thomson, Esq.**  
Address: Wynn Chambers, Winchester House 259-269 Old Marylebone Road,

NW1 5RA London, United Kingdom

Counsel: Mr. Thomson can be reached through counsel

Subject: IIROSA's operations in the United Kingdom concerning registration of IIROSA with the UK Charity Oversight Board

**3. Mr. Sameer Al Radhi**

Address: Mecca, Saudi Arabia

Contact Information: Mr. Al Radhi can be reached through counsel

Subject: Document custodian, Regulates overseas branch and internal auditing practices

**4. Mr. Mahmud Said**

Contact Information: Mr. Said can be reached through counsel

Subject: Annual audits of IIROSA

**5. Mr. Faiz Wardy**

Contact Information: Mr. Wardy can be reached through counsel

Subject: Secretary for IIRO-IDN

**6. Mr. Hamdoun Muhsin Ben Abdel Rahman**

Contact Information: Mr. Rahman can be reached through counsel

Subject: Secretary for IIRO-IDN

**7. Mr. Kuswanto Abdul Rahman**

Contact Information: Mr. Rahman can be reached through counsel

Subject: Engineering Supervisor for IIRO-IDN

**8. Mr. Fahmi Abu Bakr Bin Sinker**

Contact Information: Mr. Sinker can be reached through counsel

Subject: Engineering Coordinator for IIRO-IDN

**9. Mr. Aidarous Rafik**

Contact Information: Mr. Rafik can be reached through counsel

Subject: Social Care Supervisor for IIRO-IDN

**10. Mr. Hamdoun Sharif Hidayet**

Contact Information: Mr. Hidayet can be reached through counsel

Subject: Social Care Coordinator for IIRO-IDN

**11. Mr. Ashraf Abdul Hakeem Mogahed**

Address: Cairo, Egypt

Contact Information: Mr. can be reached through counsel

Subject: Knowledge of IIROSA's Egyptian Activities

**12. Mr. Ali AlGeries**

Contact Information: Mr. Alheries can be reached through counsel  
Subject: Director of IIRO office in Riyadh

**13. Mr. Fahd Bin Muhammad Sanad Al Harbi**

Contact Information: Mr. Al Harbi can be reached through counsel  
Subject: IROSA Office Director in Indonesia

**14. Mr. Fahd Bin Muhammad Sanad Al Harbi**

Contact Information: Mr. Al Harbi can be reached through counsel  
Subject: IROSA Office Director in Indonesia

**15. Mr. Abdul Kareem Khalil Othman Al Mousa**

Address: IIRO Office, Jordan  
Contact Information: Mr. Othman can be reached through counsel  
Subject: Knowledge of IIROSA's Jordanian Activities

**16. Mr. Abdul Rauf Khalaf Al-Sharman**

Address: IIRO Office, Bosnia  
Contact Information: Mr. Al-Sharman can be reached through counsel  
Subject: Knowledge of IIROSA's Bosnian Activities

**17. Dr. Mangom Ceesay**

Address: IIRO Office, Senegal  
Contact Information: Dr. Ceesay can be reached through counsel  
Subject: Knowledge of IIROSA's Senegal Activities

**18. Mr. Ismail Isaac Haron**

Address: IIRO Office, Nigeria  
Contact Information: Mr. Haron can be reached through counsel  
Subject: Knowledge of IIROSA's Nigerian Activities

**19. Mr. Saleh Al Dhebani**

Address: IIRO Office, Ethiopia  
Contact Information: Mr. Jobir can be reached through counsel  
Subject: Knowledge of IIROSA's Ethiopian Activities

**20. Mr. Ismat Al-Bahiti**

Address: IIRO Office, Balkan  
Contact Information: Mr. Al-Bahiti can be reached through counsel  
Subject: Knowledge of IIROSA's Balkan Activities

## **II. Categories and Location of Relevant Documents**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), IIROSA provides the following description, by category and location, of all documents electronically stored information, and tangible things in possession, custody, or control that it may use to support its defenses.

- 1. Letters from African charitable organizations expressing their gratitude for IIROSA's humanitarian aid; available for inspection at counsel's office**
- 2. Registration certificate as an NGO from the Islamic Transitional Government of Afghanistan Ministry of Planning; available for inspection at counsel's office**
- 3. Documents relating to IIROSA's structure, mission, rules, and objectives as a charitable organization\***
- 4. Documents relating to IIROSA's banking accounts, financial statements, balance sheets, income statements, and annual reports\***
- 5. Documents relating to projects undertaken and financed by IIROSA \***
- 6. Documents relating to branch overseas regulation \***
- 7. Documents relating to internal auditing policies and procedures \***
- 8. IIROSA warehouse documents \***
- 9. Documents relating to annual auditing statements \***
- 10. Documents relating to donations**
- 11. Documents relating to Financial Regulations of IIRO, 1993.**
- 12. Documents relating to decisions on Financial and administrative controls.**
- 13. Documents relating to Rules and Regulations and Instructions for the Department of Planning & Budget.**
- 14. Documents relating to charity work in Bangladesh and people of Bangladesh praising IIROSA for their work.**

15. **Annual Report showing charity work for -2001-2002**
16. **Letters from United Nations showing IIROSA designated as official representative to the United Nations**
17. **Frame work Agreement showing operational partnership between United Nations High Commissioner for Refugees and IIROSA.**
18. **Letter from Standard Pakistanis General Repatriation Committee expressing their gratitude for IIROSA'S charity work.\***
19. **Documents relating to IIROSA activities in Indonesia and the Philippines can be located in counsel's office.**

All of the aforesaid documents can be located in the following addresses:

- **Martin McMahon & Associates  
1150 Connecticut Ave., N.W., Suite 900  
Washington, D.C. 20036**
- **All of the documents referenced but not produced in response to the Plaintiffs' Rule 34 request will be available for inspection in Jeddah, Saudi Arabia**

### **III. Computation of Damages**

IIROSA has not asserted a claim for damages against any other party in this action.

### **IV. Insurance**

At the present time, IIROSA is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

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\* These documents have already been produced to 9/11 lawyers

Respectfully Submitted,

MARTIN F. MCMAHON & ASSOCIATES

/s/ Martin F. McMahon, Esq.

Martin F. McMahon, Esq. #196642

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*Counsel for International Islamic Relief  
Organization Saudi Arabia*